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10 Attorneys for Defendants  
11 AMERICAN EXPRESS TRAVEL RELATED SERVICES  
12 COMPANY, INC., AMERICAN EXPRESS CENTURION BANK,  
13 and AMERICAN EXPRESS BANK, FSB

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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND BRANCH**

14 HEIDI PICKMAN, ON HER OWN BEHALF, ) Case No. C 11 03610 JSC  
15 ON BEHALF OF THOSE SIMILARLY )  
16 SITUATED, AND ON BEHALF OF THE ) [Assigned to the Hon. Jacqueline Scott Corley]  
17 GENERAL PUBLIC OF THE STATE OF )  
18 CALIFORNIA, )  
19 Plaintiff, )  
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vs. )  
20 AMERICAN EXPRESS TRAVEL RELATED )  
21 SERVICES, INC., AMERICAN EXPRESS )  
22 CENTURION BANK, AND AMERICAN )  
23 EXPRESS BANK, FSB )  
24 Defendants. )  
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26 )  
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28 )

## **STIPULATION**

WHEREAS, on June 3, 2011, plaintiff Heidi Pickman ("Plaintiff") filed a Class Action Complaint in the Superior Court for the County of Alameda (the "Action");

WHEREAS, on July 13, 2011, Plaintiff filed a First Amended Complaint (the "First Amended Complaint") in the Superior Court for the County of Alameda.

WHEREAS, on July 22, 2011, defendants American Express Travel Related Services Company, Inc., American Express Centurion Bank, and American Express Bank, FSB (collectively "Defendants") removed the Action to this Court;

**WHEREAS, Defendants' response to the First Amended Complaint currently is due on or before July 29, 2011;**

WHEREAS, Plaintiff may move to remand this Action to state court up to and including at least August 24, 2011, pursuant to 28 U.C.S. §1447(c), Fed.R.Civ.P., Rules 6(a) and 5(b), and agreement of the Parties without further leave of the Court and Plaintiff anticipates filing such a motion to remand;

WHEREAS, to coordinate the filing of Plaintiff's motion to remand with Defendants' response to the First Amended Complaint, the parties have agreed to a brief extension of the time for Defendants to answer or otherwise respond to the First Amended Complaint:

WHEREAS, pursuant to Local Rule 6-1(a), parties may agree to an extension of time within which to answer or otherwise respond to a complaint, provided the change will not alter the date of any event or any deadline already fixed by Court order:

WHEREAS, the extension proposed herein will not alter the date of any event or any deadline already fixed by Court order;

**WHEREAS**, no previous extensions have been requested; and

**WHEREAS**, this Stipulation is made in good faith and not for purposes of delay.

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that Defendants shall respond, whether in this Court or the state Court, to the First Amended Complaint within seven (7) days of this Court's Order being entered on Plaintiff's

1 anticipated Motion to Remand, or by no later than August 31, 2011, should no such motion be filed  
2 by Plaintiff or the time otherwise extended by further order of the Court.

3 IT IS SO STIPULATED.  
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5 Dated: July 28, 2011

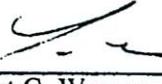
6 STROOCK & STROOCK & LAVAN LLP  
7 JULIA B. STRICKLAND  
STEPHEN J. NEWMAN  
JIAE MOON

8  
9 By:   
10 Stephen J. Newman

11 Attorneys for Defendants  
12 AMERICAN EXPRESS TRAVEL  
13 RELATED SERVICES COMPANY, INC.,  
14 AMERICAN EXPRESS CENTURION  
15 BANK, and AMERICAN EXPRESS BANK,  
16 FSB

17 Dated: July 28, 2011

18 WEEMS LAW OFFICES  
19 MARGARET MULLINS WEEMS  
20 ROBERT C. WEEMS

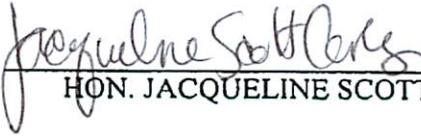
21 By:    
22 Robert C. Weems

23 Attorneys for Plaintiff  
24 HEIDI PICKMAN

25 (PROPOSED) ORDER

26 PURSUANT TO THE STIPULATION, IT IS SO ORDERED.  
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28 Dated: 7-29-11

 HON. JACQUELINE SCOTT CORLEY